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July 10, 2024

Via ECF

The Honorable Michael E. Farbiarz
United States District Judge
Lautenberg U.S. Post Office & Courthouse
Two Federal Square
Newark, New Jersey 07102

United States v. Coburn & Schwartz, Criminal No. 19-120 (MEF)

Dear Judge Farbiarz:

We write on behalf of Defendants Gordon Coburn and Steven Schwartz, and together with non-party Cognizant Technology Solutions Corporation (“Cognizant”), to respectfully request a further adjournment of our time in which to respond to the Court’s Order regarding Defendants’ subpoena to Cognizant for certain Pune-related information. ECF Nos. 724, 735.

In accordance with Your Honor’s Order and while reserving their respective rights, the relevant parties are still involved in continued discussions, including the exchange of specific proposals, that may obviate the need for a ruling on Defendants’ proposed subpoena. We believe these discussions have been fruitful, and in order to allow them to continue, the parties respectfully request that the deadline set in the Court’s July 1, 2024 Order be extended to July 15, 2024 so that the parties may continue their discussions and report back to the Court on or before that date.

Respectfully submitted,

/s/ Roberto Finzi

Roberto Finzi

cc: All counsel of record (via ECF)